

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA

CASE NO. 25-cr-80044-Rosenberg/Reinhart

8 U.S.C. § 1324(a)(2)(B)(ii)

8 U.S.C. § 1327

8 U.S.C. § 1326(a) & (b)(2)

18 U.S.C. § 982(a)(6)

18 U.S.C. § 981(a)(1)(C)

UNITED STATES OF AMERICA

vs.

JERMAINE DOMINGO WILLIAMS,  
SADIN MIGUEL TINEO SANTANA,  
SEBASTIAO CLEUBER BORGES DA CRUZ,  
and RAUL ANTONIO MORENO-GARCIA,

Defendants.

FILED BY TM D.C.

**Mar 25, 2025**

ANGELA E. NOBLE  
CLERK U.S. DIST. CT.  
S. D. OF FLA. - WPB

INDICTMENT

The Grand Jury charges that:

COUNTS 1-8

**Bringing Aliens to the United States for Private Financial Gain  
(8 U.S.C. § 1324(a)(2)(B)(ii))**

On or about March 13, 2025, in Palm Beach County, in the Southern District of Florida,  
and elsewhere, the defendant,

**JERMAINE DOMINGO WILLIAMS,**

did knowingly bring, and attempt to bring, an alien, as set forth in Counts 1 through 8 below, to  
the United States for the purpose of private financial gain, knowing and in reckless disregard of  
the fact that such alien had not received prior official authorization to come to, enter, and reside in  
the United States, regardless of any official action which might later be taken with respect to such  
alien:

<u>Count</u>	<u>Alien</u>
1	SADIN MIGUEL TINEO SANTANA
2	SEBASTIAO CLEUBER BORGES DA CRUZ
3	RAUL ANTONIO MORENO-GARCIA
4	N.B.
5	J.E.
6	S. LNU
7	J.L.
8	R.P.

In violation of Title 8, United States Code, Section 1324(a)(2)(B)(ii).

**COUNT 9**  
**Aiding or Assisting Certain Aliens to Enter**  
**(8 U.S.C. § 1327)**

On or about March 13, 2025, in Palm Beach County, in the Southern District of Florida, and elsewhere, the defendant,

**JERMAINE DOMINGO WILLIAMS,**

did knowingly aid and assist an alien, Sadin Miguel Tineo Santana, to enter the United States, said alien being inadmissible under Title 8, United States Code, Section 1182(a)(2), as an alien who had been convicted of an aggravated felony.

In violation of Title 8, United States Code, Section 1327 and Title 18, United States Code, Section 2.

**COUNT 10**  
**Illegal Reentry by an Aggravated Felon**  
**(8 U.S.C. § 1326(a) and (b)(2))**

On or about March 13, 2025, in Palm Beach County, in the Southern District of Florida, and elsewhere, the defendant,

**SADIN MIGUEL TINEO SANTANA,**

an alien, having previously been removed from the United States on or about October 15, 2024, did enter, and attempt to enter, the United States, knowingly and unlawfully, without the Attorney General of the United States or his/her successor, the Secretary of Homeland Security (Title 6, United States Code, Sections 202(3), 202(4), and 557), having expressly consented to such alien's reapplying for admission to the United States, in violation of Title 8, United States Code, Section 1326(a) and (b)(2).

**COUNT 11**

**Illegal Reentry by a Deported Alien  
(8 U.S.C. § 1326(a))**

On or about March 13, 2025, in Palm Beach County, in the Southern District of Florida, and elsewhere, the defendant,

**SEBASTIAO CLEUBER BORGES DA CRUZ,**

an alien, having previously been removed from the United States on or about March 22, 2011, did enter, and attempt to enter, knowingly and unlawfully, without the Attorney General of the United States or his/her successor, the Secretary of Homeland Security (Title 6, United States Code, Sections 202(3), 202(4), and 557), having expressly consented to such alien's reapplying for admission to the United States, in violation of Title 8, United States Code, Section 1326(a).

**COUNT 12**

**Illegal Reentry by a Deported Alien  
(8 U.S.C. § 1326(a))**

On or about March 13, 2025, in Palm Beach County, in the Southern District of Florida, and elsewhere, the defendant,

**RAUL ANTONIO MORENO-GARCIA,**

an alien, having previously been removed from the United States on or about October 15, 2024, did enter, and attempt to enter, knowingly and unlawfully, without the Attorney General of the

United States or his/her successor, the Secretary of Homeland Security (Title 6, United States Code, Sections 202(3), 202(4), and 557), having expressly consented to such alien's reapplying for admission to the United States, in violation of Title 8, United States Code, Section 1326(a).

**FORFEITURE ALLEGATIONS**

1. The allegations of this Indictment are hereby re-alleged and by this reference fully incorporated herein for the purpose of alleging forfeiture to the United States of certain property in which the defendant, **JERMAINE DOMINGO WILLIAMS**, has an interest.

2. Upon conviction of a violation of Title 8, United States Code, Section 1324, as alleged in this Indictment, the defendant shall forfeit to the United States, pursuant to Title 18, United States Code, Section 982(a)(6):

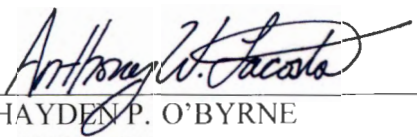
- a. any conveyance, including any vessel, vehicle, or aircraft, used in the commission of such offense;
- b. any property, real or personal, that constitutes, or is derived from, or is traceable to any proceeds obtained, directly or indirectly, from the commission of such offense; and
- c. any property, real or personal, that was used to facilitate, or intended to be used to facilitate, the commission of such offense.

3. Upon conviction of a violation of Title 8, United States Code, Section 1327, as alleged in this Indictment, the defendant shall forfeit to the United States any proceeds, real or personal, which constitutes or is derived from proceeds traceable to such offense, pursuant to Title 18, United States Code, Section 981(a)(1)(C).

All pursuant to Title 18, United States Code, Sections 982(a)(6) and 981(a)(1)(C) and the procedures set forth in Title 21, United States Code, Section 853, as incorporated by Title 18, United States Code, Section 982(b)(1) and Title 28, United States Code, Section 2461(c).

A TRUE BILL 

  
FOREPERSON

  
for  
HAYDEN P. O'BYRNE  
UNITED STATES ATTORNEY

  
JONATHAN R. BAILYN  
ASSISTANT UNITED STATES ATTORNEY

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA**

UNITED STATES OF AMERICA

CASE NO.: \_\_\_\_\_

V.

JERMAINE DOMINGO WILLIAMS,  
SADIN MIGUEL TINEO SANTANA,  
SEBASTIAO CLEUBER BORGES DA CRUZ,  
and RAUL ANTONIO MORENO-GARCIA

**CERTIFICATE OF TRIAL ATTORNEY****Superseding Case Information:**

New Defendant(s) (Yes or No) \_\_\_\_\_

Number of New Defendants \_\_\_\_\_

Total number of new counts \_\_\_\_\_

**Court Division** (select one)

☐ Miami      ☐ Key West      ☐ FTP  
☐ FTL      ☒ WPB

I do hereby certify that:

1. I have carefully considered the allegations of the Indictment, the number of defendants, the number of probable witnesses and the legal complexities of the Indictment/Information attached hereto.
2. I am aware that the information supplied on this statement will be relied upon by the Judges of this Court in setting their calendars and scheduling criminal trials under the mandate of the Speedy Trial Act, 28 U.S.C. §3161.

3. Interpreter: (Yes or No) Yes  
List language and/or dialect: Span'sh & Port'gs

4. This case will take 3 days for the parties to try.
5. Please check appropriate category and type of offense listed below:

(Check only one)

I ☒ 0 to 5 daysII ☐ 6 to 10 daysIII ☐ 11 to 20 daysIV ☐ 21 to 60 daysV ☐ 61 days and over

(Check only one)

☐ Petty☐ Minor☐ Misdemeanor☒ Felony

6. Has this case been previously filed in this District Court? (Yes or No) No  
If yes, Judge \_\_\_\_\_ Case No. \_\_\_\_\_
7. Has a complaint been filed in this matter? (Yes or No) Yes  
If yes, Judge William Matthewman Magistrate Case No. 9:25-mi-08139-WM
8. Does this case relate to a previously filed matter in this District Court? (Yes or No) No  
If yes, Judge \_\_\_\_\_ Case No. \_\_\_\_\_
9. Defendant(s) in federal custody as of March 13, 2025
10. Defendant(s) in state custody as of \_\_\_\_\_
11. Rule 20 from the \_\_\_\_\_ District of \_\_\_\_\_
12. Is this a potential death penalty case? (Yes or No) No
13. Does this case originate from a matter pending in the Central Region of the U.S. Attorney's Office prior to October 3, 2019 (Mag. Judge Jared M. Strauss)? (Yes or No) No
14. Did this matter involve the participation of or consultation with Magistrate Judge Eduardo I. Sanchez during his tenure at the U.S. Attorney's Office, which concluded on January 22, 2023? No
15. Did this matter involve the participation of or consultation with Magistrate Judge Marty Fulgueira Elfenbein during her tenure at the U.S. Attorney's Office, which concluded on March 5, 2024? No
16. Did this matter involve the participation of or consultation with Magistrate Judge Ellen F. D'Angelo during her tenure at the U.S. Attorney's Office, which concluded on October 7, 2024? No

By: Jonathan Bailyn

Assistant United States Attorney

Court ID No. A5502602



UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA

PENALTY SHEET

**Defendant's Name:** JERMAINE DOMINGO WILLIAMS

**Case No:** \_\_\_\_\_

Counts #: 1-2

Bringing Aliens to the United States for Private Financial Gain

Title 8, United States Code, Section 1324(a)(2)(B)(ii)

- \* **Max. Term of Imprisonment:** 10 Years' Imprisonment
- \* **Mandatory Min. Term of Imprisonment (if applicable):** 3 Years' Imprisonment
- \* **Max. Supervised Release:** 3 Years
- \* **Max. Fine:** \$250,000

Counts #: 3-8

Bringing Aliens to the United States for Private Financial Gain

Title 8, United States Code, Section 1324(a)(2)(B)(ii)

- \* **Max. Term of Imprisonment:** 10 Years' Imprisonment
- \* **Mandatory Min. Term of Imprisonment (if applicable):** 5 Years' Imprisonment
- \* **Max. Supervised Release:** 3 Years
- \* **Max. Fine:** \$250,000

Count #: 9

Aiding or Assisting Certain Aliens to Enter

Title 8, United States Code, Section 1327

- \* **Max. Term of Imprisonment:** 10 Years' Imprisonment
- \* **Mandatory Min. Term of Imprisonment (if applicable):** N/A
- \* **Max. Supervised Release:** 3 Years
- \* **Max. Fine:** \$250,000

\*Refers only to possible term of incarceration, supervised release and fines. It does not include restitution, special assessments, parole terms, or forfeitures that may be applicable.

**Defendant's Name:** SADIN MIGUEL TINEO SANTANA

**Case No:** \_\_\_\_\_

**Count #:** 10

**Illegal Reentry by an Aggravated Felon**

**Title 8, United States Code, Section 1326(a) and (b)(2)**

**\* Max. Term of Imprisonment:** 20 Years' Imprisonment

**\* Mandatory Min. Term of Imprisonment (if applicable):** N/A

**\* Max. Supervised Release:** 3 Years

**\* Max. Fine:** \$250,000

**\*Refers only to possible term of incarceration, supervised release and fines. It does not include restitution, special assessments, parole terms, or forfeitures that may be applicable.**



**Defendant's Name:** SEBASTIAO CLEUBER BORGES DA CRUZ

**Case No:** \_\_\_\_\_

Count #: 11

Illegal Reentry by a Deported Alien

Title 8, United States Code, Section 1326(a)

\* **Max. Term of Imprisonment:** 2 Years' Imprisonment

\* **Mandatory Min. Term of Imprisonment (if applicable):** N/A

\* **Max. Supervised Release:** 1 Year

\* **Max. Fine:** \$250,000

**\*Refers only to possible term of incarceration, supervised release and fines. It does not include restitution, special assessments, parole terms, or forfeitures that may be applicable.**

**Defendant's Name:** RAUL ANTONIO MORENO-GARCIA

**Case No:** \_\_\_\_\_

Count #: 12

Illegal Reentry by a Deported Alien

Title 8, United States Code, Section 1326(a)

**\* Max. Term of Imprisonment:** 2 Years' Imprisonment

**\* Mandatory Min. Term of Imprisonment (if applicable):** N/A

**\* Max. Supervised Release:** 1 Year

**\* Max. Fine:** \$250,000

**\*Refers only to possible term of incarceration, supervised release and fines. It does not include restitution, special assessments, parole terms, or forfeitures that may be applicable.**